

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Sandwich Isles Communications, Inc.

FCC Order 16-165

To: The Commission

**DECLARATION OF RANDALL Y.C. HO**

The undersigned hereby declares and states as follows:

1. My name is Randall Y.C. Ho and I am over the age of eighteen (18). I give this declaration based on my own knowledge and, if called, could testify competently to the facts attested to herein.
2. I have been the Chief Financial Officer for Sandwich Isles Communications, Inc. ("SIC") since 2000. I am responsible for the overall financial management of the company. My duties include overseeing the accounting department and the preparation of the company's financial statements.
3. The financial records of SIC are maintained in accordance with Generally Accepted Accounting Principles (GAAP) and Part 32-Uniform System of Accounts for Telecommunications Companies (47 C.F.R. Part 32).
4. SIC's financial records and financial statements have been audited annually since 2001 by the Aldridge Group, an independent CPA firm that specializes in auditing rural telephone companies. Copies of the audit are submitted annually to the Rural Utility Service ("RUS").
5. GVNW Consulting Inc. ("GVNW"), a consulting firm that specializes in services to rural telephone companies, prepares SIC's annual cost study, using the audited financial

statements, discussions with SIC's accountants, engineers, and staff. GVNW has assisted SIC since 1997. GVNW submits the cost study annually to The National Exchange Carrier Association ("NECA").

6. NECA conducted on-site reviews of SIC in 2003, 2004, 2010, and 2013. No major adjustments were proposed.

7. RUS audited SIC in 2002, 2005, and 2009. There were no significant findings.

8. The IRS conducted a tax year 2003 audit of SIC during 2006 to 2008, with no final adjustments issued.

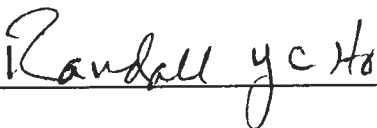
9. In 2008, Congressman Waxman's Oversight Committee audited SIC's Universal Service Fund ("USF") program for 2006 and 2007. No report was issued.

10. In 2012, the FCC Office of the Inspector General reviewed SIC's 2010 records. No report was issued.

11. The Universal Service Administrative Company ("USAC") audited SIC in 2008 and 2010. The report found that USF disbursements to SIC were understated in 2007. USAC also performed High Cost Payment Quality Assessments in 2011, 2012, 2014, and 2015. There were no significant findings.

12. Attached hereto as Exhibit "A" is a true and correct copy of a chart summarizing the audits and investigations of SIC since 1997.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 2, 2017.

  
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Randall Y.C. Ho

